

**UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS**

D.V.D., *et al.*,

Individually and on behalf of all others
similarly situated,

Plaintiffs,

V.

U.S. Department of Homeland Security, *et al.*,)

Defendants.

No. 1:25-cv-10676-BEM

**DEFENDANTS' STATUS REPORT REGARDING MOTION FOR PROTECTIVE
ORDER (ECF NO. 148)**

In Defendants' Motion for Protective Order, Defendants indicated that they would "file a status report in seven days proposing a more realistic timeline for the production of responsive documents." ECF No. 148 at 9. Consistent with the aforementioned filing, Defendants hereby report that they are engaged in conferral with Plaintiffs concerning the issues raised in Defendants' Motion, with the objective of reaching a consensus regarding discovery deadlines and submitting a stipulation accordingly.

Respectfully submitted,

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Acting Assistant Attorney General

ELIANIS N. PEREZ
Assistant Director

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/s/Matthew P. Seamon
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CERTIFICATE OF SERVICE

I, Matthew Seamon, Senior Litigation Counsel, hereby certify that this document filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF) and paper copies will be sent to those indicated as non-registered participants.

Dated: June 6, 2025

/s/ Matthew P. Seamon
Matthew P. Seamon
Senior Litigation Counsel